

OCT 23 2007 Mbc

DISTRICT COURT OF GUAM JEANNE G. QUINATA 2 TERRITORY OF GUAM Clerk of Court 3 Civil Case No. 04-00006 JULIE BABAUTA SANTOS, et al., 4 Petitioners, 5 v. 6 FELIX P. CAMACHO, et al., 7 Respondents. 8 CHARMAINE R. TORRES, et al., 9 Civil Case No. 04-00038 Plaintiffs, 10 v. 11 GOVERNMENT OF GUAM, et al., 12 Defendants. 13 14 MARY GRACE SIMPAO, et al, Civil Case No. 04-00049 Plaintiffs, 15 OBJECTORS SIMPAO AND CRUZ' REQUEST TO AMEND v. 16 SUBMITTED FINDINGS OF GOVERNMENT OF GUAM, FACT AND CONCLUSIONS OF 17 LAW Defendant, 18 v. 19 FELIX P. CAMACHO, Governor of Guam 20 Intervenor-Defendant. 21 22 23 24. TOUSLEY BRAIN STEPHENS PLLC

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1	COME NOW Objectors Mary Grace Simpao and Janice Cruz and request the Court
2	allow them to amend submitted Findings of Fact and Conclusions of Law. On October
3	19 th , 2007, counsel for Objectors received a Declaration made by the Deputy Director of
4	the Department of Revenue and Taxation. Although the Government had agreed to
5	provide the information contained within the Declaration at the fairness hearing, it did not
6	produce it until the afternoon of the day the Objector's Findings of Fact and Conclusions
7	were due. This was too late to include the information in filed Findings and Conclusions.
8	The new information is clearly relevant since it reveals that the Government's
9	notice program generated a response of less than 5%. This is astounding when one
0	remembers that individual claims are worth hundreds to thousands of dollars; amounts
1	which an informed class member would not forego.
2	Respectfully Submitted,
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4	By:
5	Attorney for Objectors
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Document 539 Filed 10/23/2007